1		FILEDLODGED]	Magistrate Judge Grady J. Leupold		
1						
2		CLERK U.S. DISTRICT COURT WESTERN DISTRICT OF WASHINGTON AT TACOMA				
3		BY DEPUTY				
4						
5						
6						
7	UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF WASHINGTON					
8	AT TACOMA					
9						
10	UNITED STATES OF AMERICA,			CASE NO. MJ25-5218		
11	Plaintiff,					
12				COMPLAINT for VIOLATION		
13	V.					
14	CHARLES ETHAN FIELDS and			18 U.S.C. §§ 2111, 113(a)(6), 641, 7(3), and		
15	LEVI AUSTIN FRAKES,			2		
16		Defendants.				
17						
18	DEFORE Manietrate Indea Condex I. I. avanald IIIaita I States Manietrate Inde					
19	BEFORE Magistrate Judge Grady J. Leupold, United States Magistrate Judge,					
20	United States Courthouse, Tacoma, Washington, the undersigned complainant being duly					
21	sworn states:					
22	<u>COUNT ONE</u>					
23	(Robbery)					
24	On or about June 1, 2025, at Joint Base Lewis-McChord, in the special maritime					
25	and territorial jurisdiction of the United States, and within the Western District of					
26	Washington, CHARLES ETHAN FIELDS and LEVI AUSTIN FRAKES, by force and					
27	I					

Complaint - 1 United States v. Fields and Frakes USAO2025R00688 UNITED STATES ATTORNEY 1201 PACIFIC AVENUE, SUITE 700 TACOMA, WASHINGTON 98402 253-428-3800

violence and by intimidation, did take and attempt to take from the person and presence 1 2 of Victim 1, property of value belonging to the United States Army. 3 All in violation of Title 18, United States Code, Sections 2111, 7(3), and 2. 4 **COUNT TWO** 5 (Assault) On or about June 1, 2025, at Joint Base Lewis-McChord, in the special maritime 6 and territorial jurisdiction of the United States, and within the Western District of 7 8 Washington, CHARLES ETHAN FIELDS and LEVI AUSTIN FRAKES did assault Victim 1, such assault resulting in serious bodily injury. 10 All in violation of Title 18, United States Code, Sections 113(a)(6), 7(3), and 2. 11 **COUNT THREE** 12 (Theft of Government Property) 13 On or about June 1, 2025, at Joint Base Lewis-McChord, in the special maritime and territorial jurisdiction of the United States, and within the Western District of 14 15 Washington, CHARLES ETHAN FIELDS and LEVI AUSTIN FRAKES, willfully and knowingly did steal and purloin, and attempt to steal and purloin, four ballistic plates and 16 other military hardware, of a value exceeding \$1,000, of the goods and property of the 17 United States. 18 19 All in violation of Title 18, United States Code, Sections 641, 7(3), and 2. 20 21 I, Christopher J. Raguse, a Special Agent with the Department of the Army 22 Criminal Investigation Division (DACID) at Joint Base Lewis-McChord, Washington (JBLM), having been first duly sworn, hereby depose and state as follows: 23 24 AFFIANT BACKGROUND & INTRODUCTION 25 1. I have been an accredited Federal Special Agent with the DACID since January 2022. I received my law enforcement certification in December 2021 upon 26

- 2. In 2022, I attended 160-hours of additional course work focused on Domestic Violence Intervention, Child Abuse Prevention and Investigative Techniques, and Structured Child Interviews which outlined the National Institute of Child Health and Human Development (NICHD) child interview guidelines.
- 3. In 2023, I completed 240-hours of additional course work focused on Advanced Crime Scene Investigative Techniques, Protective Services, and Special Victims Capability Investigations. During my course of employment with the above agency, I have handled numerous criminal investigations. Those investigations have included deaths, assaults, child assaults, and crimes against persons.
- 4. The facts set forth in this Complaint are based on the following: my own personal knowledge; knowledge obtained from other individuals during my participation in this investigation, including other law enforcement officers; interviews of witnesses; my review of records related to this investigation; communications with others who have knowledge of the events and circumstances described herein; and information gained through my training and experience.
- 5. Because this Complaint is submitted for the limited purpose of establishing probable cause, it does not set forth each and every fact that I or others have learned during this investigation. I have set forth only those facts that I believe are relevant to the determination of probable cause to believe that CHARLES ETHAN FIELDS and LEVI AUSTIN FRAKES committed the crimes of Robbery, Assault, and Theft of Government Property, in violation of Title 18, United States Code, Sections 2111, 113(a)(6), 641, 7(3), and 2.
- 6. This Complaint is being presented electronically pursuant to Federal Rules of Criminal Procedure 4.1 and 41(d)(3).

STATEMENT OF PROBABLE CAUSE

- 5. At about 8:05 PM on June 1, 2025, CHARLES ETHAN FIELDS and LEVI AUSTIN FRAKES entered JBLM through the Liberty Gate. Scans of their identification documents were approximately two seconds apart, indicative of them being in the same vehicle while entering JBLM. Surveillance footage shows a Toyota 4Runner entering JBLM through the gate when FIELDS and FRAKES' identification documents were scanned. A records check identified a 1997 Toyota 4Runner bearing Washington license plate CFN6396 is registered to FRAKES. Records also show FIELDS has a 4Runner registered in his name.
- 5. About an hour later, at 9:00 PM, Victim 1, a member of the United States Army, entered the Charlie Company – 75th Ranger Central Operations Facility ("the Ranger compound"), located on JBLM in the exclusive jurisdiction of the United States. As Victim 1 would later explain, upon entering the facility, Victim 1 encountered two unknown persons inside. The two were partially masked and were wearing Ranger physical fitness attire. Victim 1 questioned the two persons about their presence in the compound and observed U.S. Army property clustered around them. Victim 1 directed the two persons to pull their masks down, which they did. During continued questioning from Victim 1 about the two persons' presence in the compound, a fight ensued, at which point one of the unknown persons brandished a hammer and used it to assault Victim 1, striking Victim 1 in the head and torso, causing bodily harm and a large amount of blood loss. Victim 1 was able to fight the attackers and gain control of the hammer. Subsequently, one of the unknown persons then brandished a knife. At that point, Victim 1 surrendered. The unknown persons fled the building, with U.S. Government property, and then fled the Ranger compound. Surveillance video captured the unknown persons fleeing the area on foot while carrying rucksacks. While fleeing, the unknown persons dropped one rucksack outside the building, and then a second rucksack near the main

1

2

3

4

5

6

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

gate of the compound. During the assault, one of the unknown persons dropped a hat, which had the name "FIELDS" handwritten on the inside. Surveillance photographs of the two unknown persons going to and from the Ranger compound where the assault and theft occurred appear below, as does a photograph of the hat.

Complaint - 5
United States v. Fields and Frakes









6. Military Police responded just after 10 PM. Victim 1 was subsequently transported to Madigan Army Medical Center for evaluation of injuries. The photographs below were taken while Victim 1 was at the hospital.





7. Department of the Army Criminal Investigation Division (DACID) special agents responded to the Ranger compound at about 9:00 AM the next morning, June 2, 2025. Investigators conducted a crime scene examination and collected a cut piece of a lock and a bolt cutter as evidence. I believe the two unknown persons had likely used the

bolt cutter to gain access into the facility. DACID also collected disposable face masks and latex gloves from the scene. Investigators identified blood on the rucksack bag that the two persons had dropped outside the compound; some contents of the rucksack had spilled onto the ground and DACID determined that the two unknown persons had attempted to steal approximately \$14,000.00 of U.S. Government property, most of which was recovered at the scene. That property consisted of ballistic helmets, rifle plates, and communications equipment. The ballistic plates alone are valued at approximately \$6,200.

- 8. At about 12:00 PM, DACID conducted a records check of FIELDS (the name handwritten on the inside of the hat found at the crime scene) and identified him as having entered JBLM at 8:05 PM the night before (with FRAKES). Investigators also learned FIELDS had a listed residence with the Washington Department of Licensing in Lacey, Washington. FRAKES also has a Washington driver's license with a registered address at the same residence in Lacey. A record check of personnel records maintained by the Department of Defense showed FIELDS and FRAKES residing at the same address in Lacey. DoD records also showed FIELDS and FRAKES previously served in the military.
- 9. DACID agents then conducted surveillance at the Lacey address and observed a black Toyota 4Runner arrive at the residence and park in the driveway at approximately 12:45PM. The vehicle was identified as being registered to FIELDS.
- 10. Other agents interviewed Victim 1 that afternoon. During the interview, Victim 1 stated that had asked around his unit about the name FIELDS, based on the hat that was left at the scene. Victim 1 learned that FIELDS had been assigned to the Ranger Battalion around 2021 and was shown a photo of FIELDS by other persons in his unit. From that photo, Victim 1 identified FIELDS as one of the unknown persons who had assaulted him the night before.

11. Later that day, DACID agents requested and obtained a search warrant from Thurston County Superior Court allowing the search of FIELDS' and FRAKES' persons, their residence, and vehicles. State and federal law enforcement officers executed the warrant late in the evening on June 2, 2025, and seized numerous items of evidence, including, but not limited to, approximately 35 weapons, including rifles, pistols, short-barreled rifles, and an MG32 machine gun; weapons suppressors (i.e., silencers), some of which appear to have been 3D-printed; military property, including night vision devices, ballistic plates and plate carriers, and helmets; military munitions; and military explosives such as blasting caps, flashbangs, and smoke grenades. During the search of the residence, law enforcement observed numerous Nazi/white supremacy memorabilia, murals, and literature in every bedroom and near several stockpiles of weapons and military equipment. Agents also seized personal electronic devices, clothing believed to have been worn during the assault on Victim 1, and approximately \$24,000 in cash. Agents were able to identify some of the seized items as military property due to the serial numbers and other markings on the items. I know, based on my training and experience, that some of the military items agents recovered are unlawful to possess without unique permission from the DoD and some of the items are so restricted that active duty military members are not permitted to have or store them in their personal residences. Photos of some of the seized evidence (including a pair of boots with bloodstains on them) appear on the following page.



26

27











RE, SUPFACE TRIP MASA: LOT PS104F001-007



Complaint - 9 United States v. Fields and Frakes

UNITED STATES ATTORNEY 1201 PACIFIC AVENUE, SUITE 700 TACOMA, WASHINGTON 98402 253-428-3800











12. Agents provided FIELDS and FRAKES with their *Miranda* warnings, and one of the men agreed to speak with agents. In a recorded statement, the man acknowledged both of them (FIELDS and FRAKES) had been stealing military property from the Ranger compound for about two years, to later sell or trade. The man admitted

- 1	1				
1	both of them were on JBLM at the Ranger compound on June 1 to steal additional items,				
2	and a fight ensued with Victim 1.				
3	13. FIELDS and FRAKES were arrested and booked into Thurston County Jail.				
4	At a hearing in Thurston County Superior Court on June 3, 2025, a judge set bail for each				
5	at \$500,000 and ordered that, if released, FIELDS and FRAKES were to be under house				
6	arrest with an ankle monitor and to have no contact with each other.				
7	14. Based on my training and experience as a DACID Special Agent and the				
8	information contained in this Affidavit, I submit there is probable cause to believe that				
9	CHARLES ETHAN FIELDS and LEVI AUSTIN FRAKES engaged in and attempted to				
10	engage in the offenses of Robbery, Assault, and Theft of Government Property, all within				
11	the special and maritime jurisdiction of the United States (i.e., JBLM) in violation of				
12	Title 18, United States Code, Sections 2111, 113(a)(6), 641, 7(3), and 2.				
13	RAGUSE.CHRIS Digitally signed by RAGUSE.CHRISTOPHER.10				
14 15	TOPHER.10675 67543633 43633 Date: 2025.06.04 09:40:59 -07'00'				
16	CHRISTOPHER J. RAGUSE				
17	Special Agent, Department of the Army, Criminal Investigation Division				
18					
19	Based on the Complaint sworn to before me, and subscribed in my				
20	presence, the Court hereby finds that there is probable cause to believe the Defendants				
21	committed the offenses set forth in the Complaint.				
22	Dated this 4th day of June 2025.				
23					
24	$\sim 1 \times 10$				
25	GRADY J. LEUPOLD				
26	United States Magistrate Judge				
27					